

OTTERBOURG P.C.

OTTERBOURG P.C.

230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 93174/0003
Matter Name: PRE-RETENTION LTL TIME
Billing Partner: RG HADDAD

August 9, 2023
BILL NO. 233104

For Services Rendered Through April 13, 2023:

Phase: L0005		MEETINGS OF AND COMMUNICATIONS WITH COMM	
<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
			<u>AMOUNT</u>
04/05/23	JSF	Participate in Videoconference with Ad Hoc Committee re: Strategic Planning and Next Steps	1.50
04/05/23	JB	Review emails TCC members re: reconstitution/meetings/strategy to oppose LTL 2.0 and emails with co-counsel	.60
04/05/23	MLC	[LTL 2] Conference call with ad hoc members and co-counsel re: preparation for first day hearing	2.50
04/05/23	JVD	Participate in call with ad hoc committee (partial)	.50
04/06/23	JSF	Participate in Videoconference with Ad Hoc Committee and Co-Counsel re: Strategy	1.10

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/23	MLC	[LTL 2] Correspondence with ad hoc members and co-counsel in preparation for first day hearings	.80	1,296.00
04/06/23	MLC	[LTL 2] Conference call with ad hoc members and co-counsel	1.10	1,782.00
04/06/23	JVD	Participate in Committee call	1.00	1,015.00
04/06/23	DAC	Call with ad hoc committee re LTL 2.0 strategy	1.00	925.00
04/07/23	JVD	Participate in call with co-counsel re: motion to dismiss and objection to preliminary injunction and follow up re: same	.80	812.00
04/07/23	DAC	Emails with co-counsel and members of ad-hoc committee re case strategy and other matters	.50	462.50
04/07/23	DAC	Conference with committee and counsel re case strategy	.70	647.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/23	RGH	Zoom meeting with committee and co-counsel to prepare for filings and hearings	.80	992.00
04/10/23	JSF	Participate in Videoconference Meeting with Ad Hoc Committee re: Initial Statement and Hearing	.80	812.00
04/10/23	MLC	[LTL II] Ad hoc committee conference call meeting	1.00	1,620.00
04/10/23	DAC	Conference with ad hoc committee and co-counsel re case strategy	.80	740.00
04/12/23	RGH	Strategy Zoom meeting with AHC attorneys	.60	744.00
04/12/23	JSF	Attend Videoconference with Co-Counsel and Ad Hoc Committee Reps re: Depositions and Litigation Strategy	.50	507.50
04/12/23	DAC	Call with ad hoc committee re various case strategy issues	.80	740.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/23	RGH	Call with Ad Hoc Committee re: discovery conference and discovery strategy	.70	868.00
04/13/23	RGH	Emails with clients and co-counsel re: discovery	.20	248.00
04/13/23	JSF	Participate in Call with Co-Counsel and Certain Member Representatives re: Preparation for Discovery and PI Hearing	.70	710.50
04/13/23	DAC	Emails with ad hoc committee and co-counsel re various case management and strategy issues	.90	832.50
04/13/23	DAC	Call with ad hoc committee and co-counsel re hearing and other discovery issues	.80	740.00
TOTAL PHASE L0005			20.70	\$24,234.00

Phase: L0006 MEETINGS OF AND COMMUNICATIONS WITH CO-C

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/23	JSF	Participate in Conference Call with D. Molton, S. Beville, G. Cicero, D. Clark, D. Stolz, MLC and JSF re: LTL Filing	.50	507.50
04/04/23	JSF	Participate in internal Meeting re: LTL Filing and First Day Pleadings, Initial Steps	1.00	1,015.00
04/04/23	MLC	[LTL 2] Conference call with Molton, Stolz, Goodman, Beville, ACS and Stolz re: new filing	.50	810.00
04/04/23	DAC	Review emails among team re new LTL filing	.70	647.50
04/05/23	JSF	Participate in Call with Ad Hoc Co-Counsel re: Next Steps	.50	507.50
04/05/23	JB	Attend LTL 2.0 team call to assess work stream/next steps	.80	724.00
04/05/23	MLC	[LTL 2] Telephone call with Andy Vara and D. Molton re: LTL 2	.30	486.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/23	MLC	[LTL 2] Conference call with co-counsel re: preparation for first day hearing	.50	810.00
04/05/23	RCY	Review emails from counsel re open issues, strategy and next steps for LTL 2.0.	2.20	1,694.00
04/05/23	JVD	Participate in Otterbourg team call	.50	507.50
04/05/23	DAC	Internal Conference re general strategy	.80	740.00
04/06/23	MLC	[LTL 2] Telephone call with Molton and Stolz re: LTL2 filings	.20	324.00
04/07/23	JSF	Call with Brown Rudnick, Otterbourg and Massey Attorneys re: Preparation of Motion to Dismiss and Objection to PI	.50	507.50
04/07/23	MLC	[LTL II]. Telephone call with Molton and Vara	.20	324.00
04/10/23	MLC	[LTL II] Telephone call with Vara and Molton	.30	486.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/23	MLC	[LTL II] Telephone call with Molton	.20	324.00
04/10/23	MLC	[LTL II] Telephone call with Stolz	.30	486.00
04/10/23	JVD	Brief call with internal team re: status and next steps	.50	507.50
04/13/23	JSF	Participate in Call with Co-Counsel re: Discovery Update	.60	609.00
TOTAL PHASE L0006			11.10	\$12,017.00

Phase: L0010 CONTESTED MATTERS/LITIGATION (GENERAL)

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/23	JSF	Review of First Day Declaration and First Day Motions	1.60	1,624.00
04/04/23	JSF	Prepare Outline of Possible Arguments and Motions for New LTL Case	1.80	1,827.00

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04/04/23	JB	Review Kim declartion (LTL 2.0), Petition/Debtor statement re: new case)	1.20	1,086.00
04/04/23	JB	Review emails TCC members/internal emails re: LTL 2.0 filing/next steps and preparation for First Days	.60	543.00
04/04/23	MLC	[LTL 2] Review of first day pleadings	2.40	3,888.00
04/04/23	RCY	Review first day pleadings re: creditors and comparison to LTL 1.0	1.80	1,386.00
04/04/23	JKH	LTL II - monitor docket, review and circulate first day motions	5.30	2,014.00
04/04/23	MRM	Review LTL II first day filings [LTL II]	2.10	1,102.50
04/04/23	DAC	Review new filings in LTL-II bankruptcy	2.30	2,127.50
04/05/23	JSF	Review of First Day Filings	.80	812.00

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04/05/23	JSF	Review of Outline re: Motions and Objections for Committee to Make	.50	507.50
04/05/23	MLC	[LTL 2] Conference call with OSHR team re: preparation for first day hearing	1.00	1,620.00
04/05/23	MLC	[LTL 2] Review of first day pleadings	1.50	2,430.00
04/05/23	JKH	Review first day motions and prepare document binders for hearing; calendar upcoming hearings	3.20	1,216.00
04/05/23	JKH	LTL II - calendar hearing dates	.20	76.00
04/05/23	MRM	Conduct research re: issues raised by first day pleadings [LTL III]	5.50	2,887.50
04/05/23	RW	Review and summarize first day motions	2.30	747.50
04/05/23	RW	Summarize Dkt. No. 4 - Kim Declaration	4.10	1,332.50

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04/05/23	JVD	Review emails and prepare list of potential action items	1.50	1,522.50
04/05/23	JVD	Review Brown Rudnick memo re: potential next steps and prepare and circulate potential additions	.80	812.00
04/05/23	DAC	Review and analysis of prior and current preliminary injunction, motion to dismiss, funding agreement, and appeal filings	6.30	5,827.50
04/06/23	RGH	Review pleadings and background information on past and current filings	2.20	2,728.00
04/06/23	RW	Review and summarize first day motions	.60	195.00
04/07/23	JSF	Review of Opening Brief of Ad Hoc Committee	1.20	1,218.00
04/07/23	MLC	[LTL II] Review of first day motions and declaration	2.20	3,564.00
04/07/23	MLC	[LTL II] Review of draft informational statement	1.10	1,782.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/23	MRM	Cont. review of first day pleadings [LTL II]	.50	262.50
04/08/23	JSF	Review and Comment on Ad Hoc Committee Opening Statement re: LTL II	2.10	2,131.50
04/08/23	JVD	Review revised draft informational brief and circulate comments and related follow up emails	1.00	1,015.00
04/08/23	DAC	Review and comment on draft case statement	2.30	2,127.50
04/09/23	JSF	Review Revised Initial Statement of Ad Hoc Committee	.80	812.00
04/10/23	RGH	Analysis of opening narrative brief	1.10	1,364.00
04/10/23	RGH	Prepare for first day hearings	1.80	2,232.00
04/10/23	JSF	Review of Final Opening Statement of Ad Hoc Committee re: Bankruptcy	.60	609.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/23	JSF	Review of Ad Hoc Committee Draft Objection to First Day Motions	.20	203.00
04/10/23	JB	Review status of first day issues/preparation for initial hearing (LTL 2.0)	.20	181.00
04/10/23	JB	Review objection to top law firm lists (LTL 2.0)	.20	181.00
04/10/23	JB	Review LTL 2.0 motion to retain Future Claims Representative (LTL 2.0)	.20	181.00
04/10/23	MLC	[LTL II] Prepared for first day hearing	1.50	2,430.00
04/10/23	MLC	[LTL II] Revised informational brief (final)	1.30	2,106.00
04/11/23	JB	Review additional filings in LTL 2.0 case in advance of first day hearing (LTL 2.0)	.20	181.00
04/11/23	MLC	[LTL II] Prepared for appearance at first day hearings	1.50	2,430.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
	04/11/23	JVD Review materials re: direct appeals to Circuit Court of Appeals and prepare and circulate summary	2.00	2,030.00
	04/12/23	JKH LTL II - Review and circulate documents on appellate docket	.60	228.00
		TOTAL PHASE L0010	72.20	\$65,580.50

Phase: L0011 NON-WORKING TRAVEL @ 50%

<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
	04/10/23	MLC [LTL II] Travel to Trenton (billed at half time)	2.00	3,240.00
	04/11/23	MLC [LTL II] Return travel from Trenton (billed at half time)	2.00	3,240.00
		TOTAL PHASE L0011	4.00	\$6,480.00

Phase: L0015 MEDIATION/SETTLEMENT

<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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04/10/23		.30	304.50
JSF	Review of Debtor's Motion to Appoint Co-Mediators		
TOTAL PHASE L0015		.30	\$304.50

Phase: L0016		COURT ATTENDANCE		
<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/23	RGH	Appear at first day hearings; meetings at courthouse pre and post hearing	13.50	16,740.00
04/11/23	JSF	Attend via Videoconference First Day Hearing (partial)	3.50	3,552.50
04/11/23	JB	Attend portion of LTL 2.0 First Day hearing/status of PI discovery/subpoenas and depositions (LTL 2.0)	3.40	3,077.00
04/11/23	MLC	[LTL II] Appearance at first day hearings	7.00	11,340.00
04/11/23	JVD	Listen to Court hearing	4.00	4,060.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
DAC	04/11/23	Attend First Day Hearing for LTL 2.0 (virtually, via zoom)	5.80	5,365.00
RGH	04/13/23	Emails and consideration of debtor's proposal re: hearing	.30	372.00
		TOTAL PHASE L0016	37.50	\$44,506.50

Phase: L0017 INJUNCTION LITIGATION IN ADVERSARY 23-01

<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	04/04/23	Review of Motion for Preliminary Injunction	1.40	1,421.00
JB	04/04/23	Review LTL 2.0 PI complaint/motion/order and prepare summary for opposition	1.90	1,719.50
JSF	04/05/23	Review of Ex Parte TRO	.30	304.50
JSF	04/05/23	Review Motion in Support of TRO and PI	1.20	1,218.00

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04/05/23	JSF	Examine Arguments for MTD and PI Objection	1.40	1,421.00
04/05/23	JB	Further review of PI Complaint/Brief/Proposed Order and analysis of fraudulent conveyance claims	1.20	1,086.00
04/05/23	JB	Review entered TRO (LTL 2.0) and emails with co-counsel	.40	362.00
04/06/23	JSF	Review Outline of Potential Arguments for MTD and PI Objection	3.40	3,451.00
04/06/23	JSF	Examine TRO Implications	.90	913.50
04/06/23	MLC	[LTL 2] Conference call with Parfitt and Green re: the TRO	.20	324.00
04/06/23	DAC	Review record and briefs from LTL 1.0 re potential opposition to preliminary injunction	4.20	3,885.00

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04/07/23	RGH	Review pleadings and arguments to prepare for first day hearing and opposition to injunction	3.30	4,092.00
04/07/23	JSF	Review of PI Papers re: Preparation of Arguments for PI Reply	3.20	3,248.00
04/07/23	DAC	Draft outline of brief in opposition to preliminary injunction and related research and review of LTL 1.0 record	7.70	7,122.50
04/08/23	RGH	Analysis of pleadings, prior decisions, moving papers and arguments for opposition to injunction and motion to dismiss	3.40	4,216.00
04/08/23	JSF	LTL - Revisions to Outline for PI Objection	2.30	2,334.50
04/08/23	JVD	Review draft outline of PI arguments and circulate comments and follow up re: same	1.60	1,624.00
04/08/23	DAC	Draft outline of opposition to preliminary injunction and related emails and research	8.90	8,232.50

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04/09/23	DAC	Revisions to preliminary injunction opposition outline and related emails	1.60	1,480.00
04/10/23	RGH	Review outline and issues for opposition to preliminary injunction	.80	992.00
04/10/23	JSF	Call with Otterbourg Team re: PI Brief and Preparation for Hearing	.80	812.00
04/10/23	JSF	Review of Outline and Arguments for Objection to PI	1.80	1,827.00
04/10/23	JB	Review case status/information brief and potential depositions (LTL 2.0)	.40	362.00
04/10/23	JB	Review Valadez lift stay motion	.20	181.00
04/10/23	MLC	[LTL II] Conference call meeting with Otterbourg team (RGH, JSF, DC, JDV, MAP) to prepare for PI and first day hearing	.80	1,296.00
04/10/23	MRM	Review LTL I PI record; correspond with L. Benson (BR) re: same [LTL II - pre-TCC]	1.10	577.50

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04/10/23	DAC	Conferences with team re preliminary injunction opposition and general strategy issues	1.00	925.00
04/10/23	DAC	Drafting of opposition brief to motion for preliminary injunction	11.70	10,822.50
04/11/23	JSF	Preparation of Objection to PI - Review of Arguments for Inclusion	.80	812.00
04/11/23	DAC	Drafting of opposition brief to motion for preliminary injunction	9.50	8,787.50
04/12/23	RGH	Litigation strategy Zoom meeting with co-counsel	.80	992.00
04/12/23	RGH	Discovery meet and confer Zoom with debtor's counsel	.60	744.00
04/12/23	RGH	Prepare brief in opposition to motion for preliminary injunction	2.50	3,100.00

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04/12/23	RGH	Prepare for depositions of Debtor witnesses	1.80	2,232.00
04/12/23	RGH	Emails regarding deposition issues	.70	868.00
04/12/23	RGH	Multiple calls with Winograd re: discovery	.20	248.00
04/12/23	JSF	Review of Correspondence re: Status of Depositions and Litigation Strategy	.60	609.00
04/12/23	JSF	Review Draft of Objection to PI	1.20	1,218.00
04/12/23	JB	Review PI deposition schedule/status of PI opposition and case filing in LTL 2.0 case	.40	362.00
04/12/23	MLC	[LTL II] Telephone call with ACS re: preparation for PI hearing	.60	972.00
04/12/23	MLC	[LTL II] Telephone call with RGH re: preparation for PI hearing	.20	324.00

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04/12/23	MLC	[LTL II] Telephone call with Molton re: preparation for PI hearing	.20	324.00
04/12/23	MLC	[LTL II] Correspondence with litigation subgroup (ACS, RGH, Molton, Winograd, Jonas, Reining) re: preparation for PI hearing	.60	972.00
04/12/23	MLC	[LTL] Telephone call with Stoltz re: preparation for PI hearing	.20	324.00
04/12/23	MLC	[LTL II] Review and comment upon document discovery outline and schedule	.60	972.00
04/12/23	DAC	Drafting of opposition brief to motion for preliminary injunction	2.50	2,312.50
04/12/23	DAC	Conference with committee re discovery strategy and other strategic items	.80	740.00
04/12/23	DAC	Attend meet and confer with opposing counsel re discovery for preliminary injunction	.50	462.50

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04/13/23	RGH	Prepare for discovery conference with Court	.50	620.00
04/13/23	RGH	Participate in discovery conference with Judge Kaplan	1.00	1,240.00
04/13/23	RGH	Zoom discovery meet and confer with debtor's counsel	.50	620.00
04/13/23	RGH	Discovery call with Brown Rudnick	.20	248.00
04/13/23	RGH	Prepare brief in opposition to motion for preliminary injunction	3.80	4,712.00
04/13/23	RGH	Review certain documents produced by debtor	1.60	1,984.00
04/13/23	RGH	Prepare for depositions of debtor and settling counsel witnesses	1.50	1,860.00
04/13/23	JSF	Review of Documents Produced by Debtors	1.30	1,319.50

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04/13/23	JSF	Review of Draft Objection to PI	.80	812.00
04/13/23	JSF	Examine Update on Deposition Status	.60	609.00
04/13/23	JSF	Review Background for Pulaski re: Upcoming Deposition by RGH	.80	812.00
04/13/23	JB	Review deposition schedule/coverage issues, documents produced and other matters related to PI trial preparation and filing of opposition to PI brief	.60	543.00
04/13/23	JKH	LTL II - Review docket and prepare for PI hearing	1.30	494.00
04/13/23	DAC	Revisions to opposition brief to preliminary injunction and emails re same	3.20	2,960.00
TOTAL PHASE L0017			110.10	\$112,459.00

Phase: L0018 DISMISSAL/TRUSTEE/EXAMINER MATTERS

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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OTTERBOURG P.C.

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NEW YORK, NY 10169-0075

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/23	JSF	Review of Entered Dismissal Order in LTL 1.0	.20	203.00
04/04/23	JSF	Review of Research re: Frustration of Purpose	.30	304.50
04/04/23	MLC	[LTL 2] Review of dismissal order in LTL 1	.80	1,296.00
04/04/23	RCY	Research issues re: Frustration of Purpose	3.30	2,541.00
04/04/23	JVD	Review new LTL chapter pleadings and extensive discussion and emails re: various issues including frustration of purpose issues and funding agreement and comparison of firms on old and new creditor lists	3.00	3,045.00
04/05/23	JSF	Review of Public Statements re: "Settlement" and PSA Parties	.70	710.50
04/05/23	JB	Review LTL 2.0 transaction agreements	.80	724.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/23	RCY	Preliminary research re frustration of purpose issues in connection with LTL 2.0.	1.60	1,232.00
04/05/23	MRM	Review revised funding agreement and support agreement [LTL II]	2.10	1,102.50
04/06/23	JSF	Review of Restructuring Support Agreement	.60	609.00
04/06/23	JB	Review analysis of new funding agreement (LTL 2.0)	.40	362.00
04/06/23	JB	Review frustration of purpose research re: disavowal of original funding agreement (LTL 2.0)	.40	362.00
04/06/23	MLC	[LTL2] Review of case law re: frustration of purpose and related issues	1.20	1,944.00
04/06/23	MRM	Prepare memo re research on issues related to new FA [LTL II]	3.70	1,942.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/23	JVD	Attention to frustration of fundamental purpose research and various emails re: same and review draft memo and provide comments	1.00	1,015.00
04/07/23	JVD	Research and review cases re: good faith filing	1.00	1,015.00
04/09/23	JSF	Review of Draft Motion to Dismiss	.60	609.00
04/10/23	RGH	Review draft motion to dismiss	.60	744.00
04/13/23	JSF	Review of PSA	.40	406.00
TOTAL PHASE L0018			22.70	\$20,167.00
TOTAL FOR SERVICES				\$285,748.50
TOTAL THIS STATEMENT				\$285,748.50